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Attorneys for Defendants

NGAN VAN LE, INDIVIDUALLY AND AS
TRUSTEE FOR THE AD VITAM AUT
CULPAM TRUST; JML HOLDINGS, LLC;
AND JML SURGICAL CENTER, LLC

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

JOCELYNE R. UY, an individual; and
WESTLEY U. VILLANUEVA, an individual,

Plaintiffs,

vs.

SANDY VAN, an individual; NGAN VAN LE,
an individual; SANDY VAN, LLC dba VAN
LAW FIRM, a Nevada Domestic Limited
Liability Company; VAN AND ASSOCIATES
LAW FIRM, PLLC, a Nevada Professional
Limited Liability Company; JML HOLDINGS,
LLC, a Nevada Domestic Limited-Liability
Company; NGAN VAN LE as Trustee for the AD
VITAM AUT CULPAM TRUST; JML
SURGICAL CENTER, LLC, a Nevada Domestic
Limited-Liability Company; DOES I through X;
and ROE CORPORATIONS 1 through X,
inclusive,

Defendants.

Case No. 2:24-cv-00599-GMN-DJA

**STIPULATION AND ORDER EXTENDING
DEADLINE FOR RESPONSES TO THE
SECOND AMENDED COMPLAINT [ECF
No. 31]**

(FIRST REQUEST)

Defendants, Sandy Van, Sandy Van, LLC dba Van Law Firm, and Van and Associates Law
Firm, PLLC (collectively, the “Van Defendants”), by and through their counsel; Defendants, Ngan
Van Le, individually and as Trustee for the Ad Vitam Aut Culpam Trust, JML Holdings, LLC, and

1 JML Surgical Center, LLC (collectively, the “Le Defendants”), by and through their counsel; and
2 Plaintiffs, Jocelyne R. Uy and Westley U. Villanueva (together, “Plaintiffs”), by and through their
3 counsel, hereby stipulate and agree as follows:

4 1. On February 19, 2025, Plaintiffs filed their Second Amended Complaint and Jury
5 Demand Against All Defendants [ECF No. 31].

6 2. Presently, the Van Defendants and the Le Defendants each have until March 5, 2025,
7 to respond to the Second Amended Complaint.

8 3. Due to work-related scheduling conflicts, including several expert reports, motion
9 practice, depositions and associated preparation sessions, and an Amended Joint Pretrial Order
10 (among other tasks), and personal conflicts for the Le Defendants’ counsel, including a family
11 vacation, and as a matter of professional courtesy extended by Plaintiffs’ counsel, the Van
12 Defendants and the Le Defendants shall each have until March 26, 2025, to respond to Plaintiffs’
13 Second Amended Complaint.

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4. This is the first request to extend the deadline for responding to the Second Amended Complaint and is made in good faith and not for purposes of delay.

IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD.

Dated this 3rd day of March, 2025.

BAILEY ♦ KENNEDY

By: /s/ Joshua P. Gilmore

DENNIS L. KENNEDY

JOSHUA P. GILMORE

TAYLER D. BINGHAM

Attorneys for Defendants

NGAN VAN LE, INDIVIDUALLY AND AS
TRUSTEE FOR THE AD VITAM AUT
CULPAM TRUST; JML HOLDINGS, LLC;
AND JML SURGICAL CENTER LLC

Dated this 3rd day of March, 2025.

WILSON, ELSE, MOSKOWITZ, EDELMAN
& DICKER LLP

By: /s/ Sheri M. Thome

SHERI M. THOME (Bar No. 8657)

NICHOLAS F. ADAMS (Bar No. 14813)

Attorneys for Defendants

SANDY VAN; SANDY VAN, LLC DBA
VAN LAW FIRM; AND VAN AND
ASSOCIATES LAW FIRM, PLLC

Dated this 3rd day of March, 2025.

JEPSEN LAW, PLLC

By: /s/ Kendra Jepsen

KENDRA JEPSEN (Bar No. 14065)

Attorneys for Plaintiffs

JOCELYN R. UY AND WESTLEY U.
VILLANUEVA

Dated this 3rd day of March, 2025.

BLACK & WADHAMS


By: /s/ Silvia U. Villanueva

SILVIA U. VILLANUEVA (Bar No. 13608)

Attorneys for Plaintiffs

JOCELYN R. UY AND WESTLEY U.
VILLANUEVA

IT IS SO ORDERED.


DANIEL J. ALBREGTS

UNITED STATES MAGISTRATE JUDGE

DATED: 3/4/2025